

**SEALED**

**FILED**

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

2014 DEC 17 PM 12:36

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA,

Plaintiff,

v.

MIKE PACE (3),  
GLEN GAY (4),

TIM JAMES KLEINMEYER (6),  
DANNY STOUT (7),

Defendants,

**SA 14 CR 1014**

**OG**

[Vio: 21 U.S.C. §§ 846, 841(a)(1)  
& 841(b)(1)(A): Conspiracy to  
Distribute and Possess with intent  
to Distribute 50 grams or more of  
methamphetamine;

[Vio: 21 U.S.C. §§ 841(a)(1) &  
841(b)(1)(A) & 18 U.S.C. § 2 :  
Aiding and Abetting Possession  
with intent to Distribute 50 grams  
or more of methamphetamine.]

THE GRAND JURY CHARGES:

COUNT ONE

[21 U.S.C. § 846

21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A)]

That beginning on or about October, 2013, and continuing to the date of the indictment in  
the Western District of Texas Defendants,

MIKE PACE (3),  
GLEN GAY (4),

TIM JAMES KLEINMEYER (6),  
DANNY STOUT (7),

and others known and unknown to the Grand Jury, did unlawfully, knowingly and intentionally  
combine, conspire, confederate, and agree together and with one another to distribute and possess  
with intent to distribute a controlled substance, which offense involved 50 grams or more of

methamphetamine a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and in violation of Title 21, United States Code, Section 846.

**COUNT TWO**

**[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A) & 18 U.S.C. & 2 ]**

That on or about October 1, 2014 , in the Western District of Texas, Defendants,

**MIKE PACE (3),**

added and abetted by each other, did knowingly, intentionally and unlawfully possess with the intent to distribute a controlled substance, which offense involved 50 grams or more methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A) and Title 18, United States Code, Section 2.

**NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE**

**[See Fed. R. Crim. P. 32.2]**

**I.**

**Drug Violations and Forfeiture Statutes**

**[Title 21 U.S.C. § 846 to violate §§ 841(a)(1) and 841(b)(1)(A), subject to forfeiture pursuant to Title 21 U.S.C. §§ 853(a)(1) and (2).**

As a result of the foregoing criminal violations set forth in Counts One and Two, the United States of America gives notice to of its intent to seek the forfeiture of the below described property upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 21 U.S.C. §§ 853(a)(1) and (2), which states:

**Title 21 U.S.C. § 853.**

(a) Any person convicted of a violation of this subchapter or subchapter II of this chapter punishable by imprisonment for more than one year shall forfeit to the United States, irrespective of any provision of State law –

(1) any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violation;

(2) any of the person's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation; ...


This Notice of Demand for Forfeiture includes, but is not limited to, the following:

**Real Property**

Real Property located and situated at  
with all buildings, appurtenances, and improvements thereon, more  
fully described as 2.962 Acres of Land facing on

Save and Except for a 0.08 Acre Tract of Land out of the northwest corner of that  
certain 2.962 Acre Tract of Land described in deed from .  
recorded in Volume 275, Page 322, Deed

A TRUE BILL,

  
FOREPERSON GRAND JURY

ROBERT PITMAN  
UNITED STATES ATTORNEY

By:

  
SAM L. PONDER  
Assistant United States Attorney